



1090 KING GEORGES POST ROAD  
SUITE 1103  
EDISON, NEW JERSEY 08837  
201-225-6160

C-584-07-89-42

July 20, 1989

Amy Brochu  
U.S. Environmental Protection Agency  
Region 2  
Edison, New Jersey 08817

Re: Letter Report for General Cable Company, EPA ID No. NJD002143261

Dear Amy:

After review of the available background information for the Environmental Priorities Initiative (EPI) PA, General Cable Company, a recommendation of **NO FURTHER REMEDIAL ACTION PLANNED (NFRAP)** is proposed. General Cable Co. is located at 25 Van Dyke Ave. in New Brunswick, New Jersey. This PA is authorized under TDD No. 02-8906-28. The recommendation is based on the following findings:

- On November 18, 1980, General Cable submitted a RCRA Part A application informing the Environmental Protection Agency (EPA) of its status as a hazardous waste treatment, storage, or disposal (TSD) facility, requesting permission to store spent solvents in containers (process code S01) and tanks (S02).
- On May 26, 1981, the owner, GK Technologies Inc., informed the EPA that General Cable Co. is a small quantity generator (SQG) and not a TSD facility, according to EPA amendments regarding SQG which were promulgated on November 19, 1980.
- Subsequent correspondence between General Cable and the EPA and between General Cable and the New Jersey Department of Environmental Protection (NJDEP) dating from November 5, 1982 to April 25, 1983 addressed the uncertainty of the status of General Cable and whether or not General Cable was in violation of standards applicable to TSD facilities.
- On July 1, 1983, the NJDEP, Division of Waste Management, Bureau of Hazardous Waste Engineering acknowledged the receipt of the request made by General Cable to be reclassified to "generator only" status. It is the understanding of the Bureau that the General Cable Company "has never stored hazardous waste in tanks and that the activity code (S02) indicating such on the company's RCRA part A application was made in error and the company only stores in containers". Based on this information the Bureau classified the facility as a "generator only" which is no longer subject to the regulations applicable to TSD facilities provided that the waste is placed in appropriate containers, which are clearly labeled, and that the waste does not accumulate for more than 90 days.

Ms. Amy Brochu  
U.S. Environmental Protection Agency  
July 20, 1989 - Page Two

These findings, plus the fact that no major violations have ever reportedly occurred at the facility, substantiate the recommendation above.

Attached are the references to support the recommendation. If you have any questions, please do not hesitate to call.

Very truly yours,

*Laura N. George*

Laura N. George

LNG/jc

Reviewed and Approved:

*Rm Naman*

## REFERENCES

1. RCRA Part A Application, General Cable Company, EPA ID No. NJD002143261.
2. Letter from Thomas P. Ambrose, Energy and Environmental Manager, GK Technologies Incorporated, to Environmental Protection Agency, Region 2, Solid Waste Office. May 26, 1981.
3. Letter from David J. Shotwell, Chief, Bureau of Compliance and Enforcement, Department of Env. Protection, Division of Waste Management, to Frank Portik, General Cable Company. November 5, 1982.
4. Letter from F.M. Portik, Industrial Relations Manager, General Cable Company, to Frank Coolik, Bureau of Engineering Review, NJDEP. November 16, 1982.
5. Letter from Conrad Simon, Director, Air and Waste Management Division, U.S. Environmental Protection Agency, Region 2, to Frank Portik, Industrial Relations Manager, General Cable Company. January 1, 1983.
6. Letter from Frank Portik, Industrial Relations Manager, General Cable Company, to Richard Baker, Permits Administration Branch, EPA Region 2. February 17, 1983.
7. Letter from Frank Coolik, Chief, Bureau of Hazardous Waste Engineering, NJDEP, Division of Waste Management, to Frank Portik, Industrial Relations Manager, General Cable Company, April 25, 1983.
8. Letter from Frank Coolick, Chief, Bureau of HW Eng, NJDEP, Division of Waste Management, to Frank Portik, Industrial Relations Manager, General Cable Company. July 1, 1983.

REFERENCE NO. 1

NJD002143261

	X	
	X	
X		X
	X	
	X	

	X	
	X	
	X	
	X	
	X	

GENERAL CABLE COMPANY

PORTIK FRANK IND REL MANAGER 201 249 8090

25 VAN DYKE AVENUE

NEW BRUNSWICK NJ 08903

25 VAN DYKE AVENUE

MIDDLESEX

NEW BRUNSWICK NJ 08903

3 46 9 (specify) Wire Prod. Misc.

(specify)

3 06 9 (specify) Rubbert Prod. Fabrication

(specify)

GENERAL CABLE COMPANY

P (specify)

201 636 5500

ONE WOODBRIDGE CENTER

WOODBRIDGE

NJ 07095

(specify)

(specify)

MANUFACTURING OF COMMUNICATIONS WIRE & CABLE THROUGH  
EXTRUSION INSULATION, ASSEMBLY, JACKETING & PACKAGING  
OPERATIONS.

F9:  $\frac{A}{S1}$

A. NAME & OFFICIAL TITLE (type or print)

E. J. Holton  
President

B. SIGNATURE

*E. J. Holton*

C. DATE SIGNED

<b>FORM 3</b> <b>RCRA</b>		<b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> <b>HAZARDOUS WASTE PERMIT APPLICATION</b> Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	<b>I. EPA I.D. NUMBER</b>											
			F M J D 0 0 2 1 4 3 2 6 1 3											

**FOR OFFICIAL USE ONLY**

<b>APPLICATION APPROVED</b>	<b>DATE RECEIVED</b> (yr., mo., & day)
	8 0 1 1 1 9

**COMMENTS**

**II. FIRST OR REVISED APPLICATION**

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

**A. FIRST APPLICATION** (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

<b>YR.</b>	<b>MO.</b>	<b>DAY</b>
55	07	15

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

<b>YR.</b>	<b>MO.</b>	<b>DAY</b>

FOR NEW FACILITIES: PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

**B. REVISED APPLICATION** (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

**III. PROCESSES - CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS

<b>Disposal:</b>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

**Treatment:**

TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
	T04	GALLONS PER DAY OR LITERS PER DAY

OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

**EXAMPLE FOR COMPLETING ITEM III** (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C										T/A C										1									
12 13 14 15										16 17 18 19										20 21 22 23									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY				
		1. AMOUNT (specify)					2. UNIT OF MEAS- URE (enter code)								1. AMOUNT					2. UNIT OF MEAS- URE (enter code)									
X-1	S 0 2	600					G						5																
X-2	T 0 3	20					E						6																
1	S 0 1	550 000					G						7																
2	S 0 2	350 000					G						8																
3													9																
4													10																

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

<b>ENGLISH UNIT OF MEASURE</b>	<b>CODE</b>
POUNDS . . . . .	P
TONS . . . . .	T

<b>METRIC UNIT OF MEASURE</b>	<b>CODE</b>
KILOGRAMS . . . . .	K
METRIC TONS . . . . .	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES									
							1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))					
X-1	K	0	5	4	900	P	T	0	3	D	8	0				
X-2	D	0	0	2	400	P	T	0	3	D	8	0				
X-3	D	0	0	1	100	P	T	0	3	D	8	0				
X-4	D	0	0	2											included with above	



EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W N J D 0 0 2 1 4 3 2 6 1 3 1										W DUP 3 2 DUP									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																			
W N J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES															
				1. PROCESS CODES (enter)															
1	F001	3000000	P	501	502														
2	F002	250000	P	501	502														
3	F005	250000	P	501	502														
4																			
5																			
6																			
7																			
8																			
9																			
10																			
11																			
12																			
13																			
14																			
15																			
16																			
17																			
18																			
19																			
20																			
21																			
22																			
23																			
24																			
25																			
26																			

**IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

$$F6: \frac{A}{55} \quad F6: \frac{A}{56}$$

EPA I.D. NO. (enter from page 1)													
F	N	J	D	0	0	2	1	4	3	2	6	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14
												3	6

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, & seconds)						LONGITUDE (degrees, minutes, & seconds)					
40	28	55	0	40	28	074	28	55	0	074	28
58	59	60	61	62	63	72	73	74	75	76	77

**VIII. FACILITY OWNER**

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER				2. PHONE NO. (area code & no.)			
E	G K TECHNOLOGIES INC			2	0	3	6
18	19	20	21	22	23	24	25
3. STREET OR P.O. BOX				4. CITY OR TOWN		5. ST.	
F	500 WEST PUTNAM AVE.			G	GREENWICH		CT
18	19	20	21	22	23	24	25
6. ZIP CODE				7. ZIP CODE			
06830				06830			
26				27			

**IX. OWNER CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

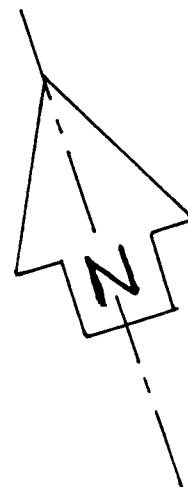
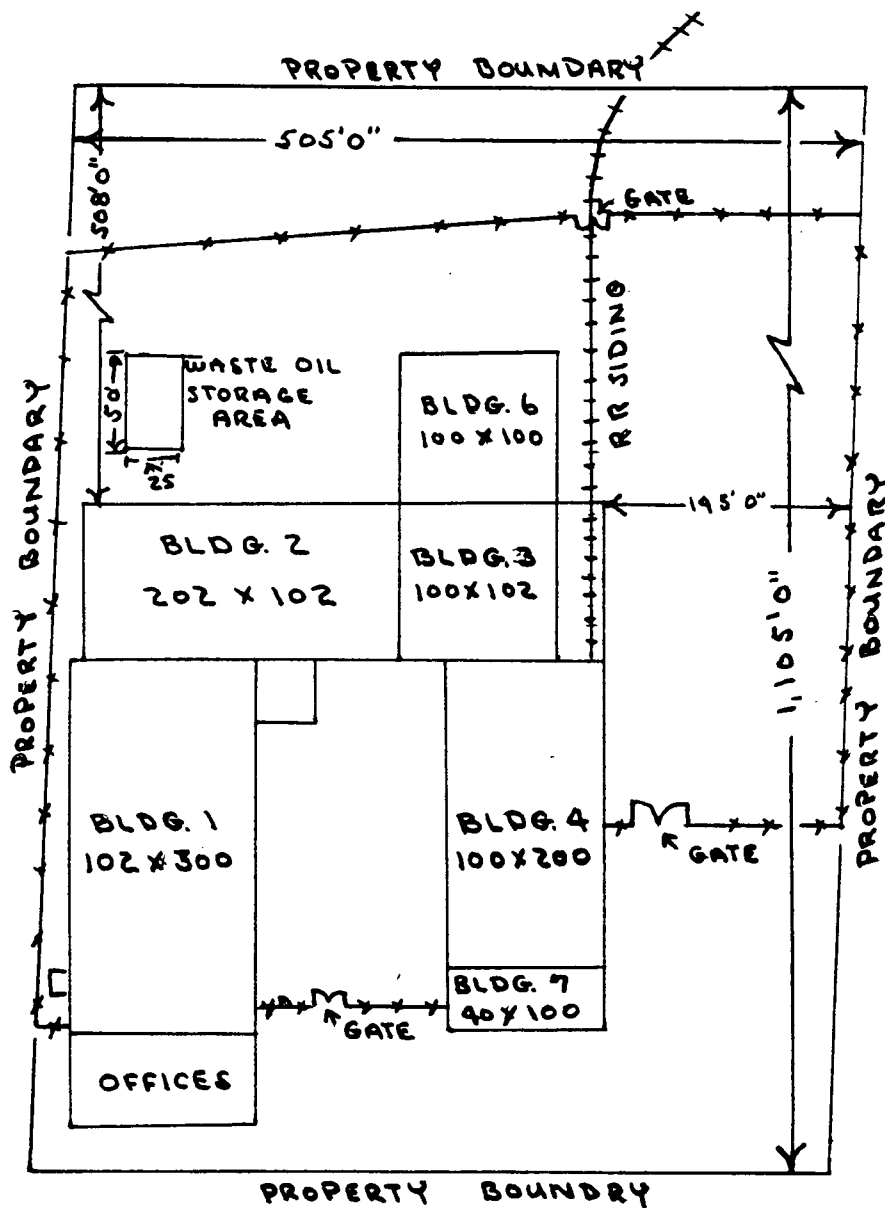
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. J. Holton	OK on amendment	

**X. OPERATOR CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
E. J. Holton	OK on amendment	

## V. FACILITY DRAWING (see page 4)



SCALE 1" = 60'0"

EPA Id No NJD002143261

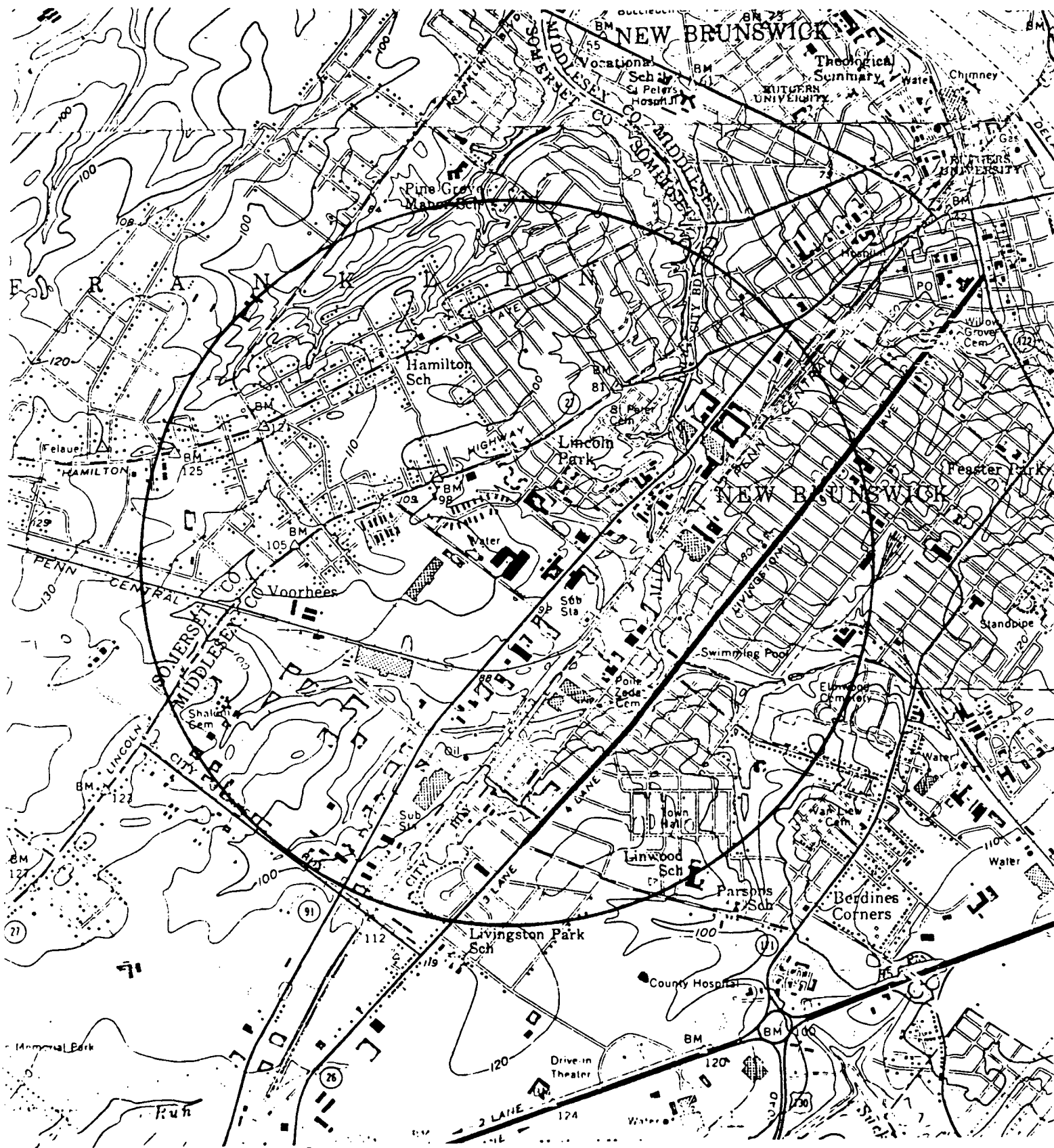


PHOTO OF TOPOGRAPHIC MAP, Above, Composite of :

1. NEW BRUNSWICK - AMS - 6164 IV NW Series V822
2. Plainfield AMS - 6165 III SW Series V822

prepared by U.S. Geological Survey

REFERENCE NO. 2

BGE  
FP

"CERTIFIED"

May 26, 1981

EPA Region II  
Solid Waste Office  
26 Federal Plaza  
New York, N. Y. 10007

RE: General Cable Company  
25 Van Dyke Avenue  
New Brunswick, N. J. 08903  
EPA I.D. No. NJD002143261

Dear Sirs:

On November 18, 1980, Part A of the RCRA hazardous waste permit application was submitted for the referenced facility.

Please be advised that after careful review of the Environmental Protection Agency's Admendments regarding small quantity generator standards that were promulgated in November 19, 1980, the New Brunswick plant is not a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act Regulations.

Please be assured that the plant will continue to abide by all regulations applicable to small quantity hazardous waste generation.

Very truly yours,



Thomas P. Ambrose  
Energy & Environmental Manager

TPA:mlh

cc: Solid Waste Administration  
Div. of Environmental Quality  
P. O. Box CN027  
Trenton, N. J. 08625

✓ F. E. Peck, Plant Manager  
New Brunswick Plant

REFERENCE NO. 3



Central

12-14-21

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT  
120 Rt. 156, CN 402, Yardville, N.J. 08625

JACK STANTON  
DIRECTOR

LINO F. PEREIRA  
DEPUTY DIRECTOR

General Cable Company  
Frank Portik  
5 Van Dyke Avenue  
New Brunswick NJ 08903

Re: NOTICE OF VIOLATION  
FAILURE TO SUBMIT ANNUAL REPORT

Dear Mr. Portik:

Pursuant to the provisions of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., the Department of Environmental Protection has determined by examination of our files that you violated N.J.A.C. 7:26-7.6(f)2 in that you failed to submit an annual report by March 1, 1982.

NOW, THEREFORE, YOU ARE HEREBY NOTIFIED that your facility shall submit the required annual report within fifteen (15) days of receipt of this Notice to: Frank Coolick, Bureau of Engineering Review, 32 East Hanover Street, Trenton, New Jersey 08625.

BE ON NOTICE that the Solid Waste Management Act establishes penalties of up to \$25,000 per day for violation of the Department's hazardous waste management regulations. Your failure to correct the above violation, or any future violation, may result in a penalty action by this Department. Failure to submit the required report by the specified date will result in daily fines as follows:

- i. During the first week after the deadline: \$100/day
- ii. During the second week after the deadline: \$200/day
- iii. During the third week after the deadline: \$500/day
- iv. During the fourth week after the deadline  
and subsequently: a maximum of \$25,000/day

If you have any questions regarding this Notice, please call the Bureau of Engineering Review at (609) 292-9880.

DATE

Nov 5, 1982

David J. Shotwell

David J. Shotwell, Chief  
Bureau of Compliance and Enforcement

rh



**REFERENCE NO. 4**



ALPHADUCT PRODUCTS

NJD002143261

P. O. Box 709, 25 Van Dyke Avenue, New Brunswick, New Jersey 08903 (201) 249-8090

"CERTIFIED"

November 16, 1982

Mr. Frank Coolick  
Bureau of Engineering Review  
32 East Hanover Street  
Trenton, New Jersey 08625

RE: Notice Of Violation  
Failure To Submit Annual Report  
GENERAL CABLE COMPANY  
25 Van Dyke Avenue  
New Brunswick, New Jersey 08903

Dear Mr. Coolick:

After a review of N.J.A.C. Subchapter 7 which was sent to me by Mr. Chang of your department and subsequent discussions with him we feel Subchapter 7 does not apply to our New Brunswick facility and therefore we are not in violation of N.J.A.C. 7:26-7.6 (f) 2.

The New Brunswick plant is not a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act. General Cable has notified the EPA Region II that we are not a T.S.D. and that the plant is considered a small quantity generator under the act. We have also assured the EPA that we will continue to abide by all applicable regulations. We have submitted the required Generator's Annual Report for 1981 during February of this year and a copy would be made available should you require it. Enclosed is a copy of our letter to the EPA Region II and the Solid Waste Administration of New Jersey regarding our classification under RCRA.

Should you have any further questions concerning our response to the notice of violation please do not hesitate to contact me.

GENERAL CABLE COMPANY

F. M. Portik  
Industrial Relations Manager

FMP/jt

encl.

**GK Technologies**  
Incorporated

500 West Putnam Avenue, Greenwich, Connecticut 06830 (203) 661-0100  
Cable Address: GKTECH GREENWICHCONNECTICUT Telex Number 996439

BG  
FP

"CERTIFIED"

May 26, 1981

EPA Region II  
Solid Waste Office  
26 Federal Plaza  
New York, N. Y. 10007

RE: General Cable Company  
25 Van Dyke Avenue  
New Brunswick, N. J. 08903  
EPA I.D. No. NJD002143261

Dear Sirs:

On November 18, 1980, Part A of the RCRA hazardous waste permit application was submitted for the referenced facility.

Please be advised that after careful review of the Environmental Protection Agency's Amendments regarding small quantity generator standards that were promulgated in November 19, 1980, the New Brunswick plant is not a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act Regulations.

Please be assured that the plant will continue to abide by all regulations applicable to small quantity hazardous waste generation.

Very truly yours,



Thomas P. Ambrose  
Energy & Environmental Manager

TPA:mlh

cc: Solid Waste Administration  
Div. of Environmental Quality  
P. O. Box CN027  
Trenton, N. J. 08625

✓ F. E. Peck, Plant Manager  
New Brunswick Plant

**REFERENCE NO. 5**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY *PA*

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

NJDA2143261

GENERAL CABLE COMPANY  
PORTIK FRANK IND REL MANA  
25 VAN DYKE AVENUE  
NEW BRUNSWICK

NJ 08903

CC: W. KOSIOWSKI

D. ROSANDER

F. MUHAMMAD -

2/4/83

T. AMBROSIO

Re:

EPA Identification number:  
Facility located at:

Dear Sir or Madam:

The Environmental Protection Agency (EPA) is charged with responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-580 (1976).]

By notification you informed EPA that you conduct activities involving hazardous waste at the above-referenced facility. By the submittal of a Part A application pursuant to the requirements of 40 CFR Part 122, you requested a permit to conduct such hazardous waste activities.

40 CFR Part 265 sets interim-status standards for hazardous waste treatment, storage, and disposal facilities. These standards apply until final administrative disposition of permit application for these facilities has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply thereto.

40 CFR §265.143 (amended on April 7, 1982) requires that by the effective date of the regulation (July 6, 1982) an owner or operator of a hazardous waste facility must establish financial assurance for closure of the facility, as well as post-closure monitoring. As of December 15, 1982, information available to EPA indicates that your facility had not submitted the documents necessary to comply with this requirement. You are therefore in violation of 40 CFR §265.143.

40 CFR §265.147 (amended on April 17, 1982) requires that by the effective date of the regulation (July 17, 1982) an owner or operator of a hazardous waste facility must establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility. As of December 15, 1982, information available to EPA indicates that your facility had not submitted the documents necessary to establish compliance with the liability insurance requirement. You are therefore in violation of 40 CFR §265.147.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or the regulations. The determination of whether a penalty is to be imposed is based upon the nature and the seriousness of the violation and any good faith efforts to comply with the applicable requirements.

It is your responsibility to correct all violations as expeditiously as possible. Should the violation(s) cited above not be cured within twenty (20) days of the date of this letter, it is likely that an action for the assessment of a civil penalty will be initiated. If you rectify the above-cited non-compliance within the twenty (20) day period, EPA will exercise its enforcement discretion and not assess a penalty for past financial requirements noncompliance. Furthermore, this letter in no way precludes an enforcement action for any other violations found at your facility.

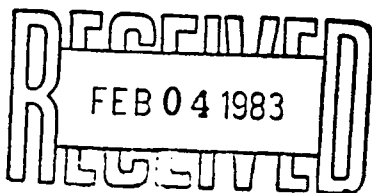
In order to ensure that you are in compliance with the regulations, you must submit a copy of the required documents to Helen Beggun, Chief, Grants Administration Branch, Office of Policy and Management, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York, 10278, within twenty (20) days of the date of this letter. Should you need any help concerning the applicability of the financial requirements to your facility, please call Mr. Joseph Cvinar of that Branch at (212) 264-9862. Please note that if you have submitted the necessary documents, you should contact Mr. Cvinar immediately.

Dated: New York, New York  
January 31, 1983



---

CONRAD SIMON  
Director, Air and Waste Management  
Division  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278



REFERENCE NO. 6

P.F.C.

P. O. Box 709, 25 Van Dyke Avenue, New Brunswick, NJ 08903-0709 (201) 249-8090

"CERTIFIED"

February 17, 1983

EPA REGION II  
Permits Administration Branch  
26 Federal Plaza  
New York, N. Y. 10278

Attention: Richard Baker

RE: GENERAL CABLE COMPANY  
25 Van Dyke Avenue  
New Brunswick, N. J. 08903  
EPA I.D. No. NJD002143261  
Notice of Violation -  
40CRF - PART 265

Dear Sir:

#  
was  
3/15/83  
As a result of my telephone conversation yesterday with Ms. Cam, of the EPA Grants Administration Branch, she has suggested we submit the following information to you in response to the above referenced violation notice.

Enclosed is a copy of a letter sent to the EPA Region II dated May 26, 1981. This letter was sent after a review of the EPA standards established for small quantity generators and requested that our New Brunswick facility be reclassified as a small quantity generator and not a TSD. In addition I have also enclosed a letter sent to the State of New Jersey Department of Environmental Protection regarding our facility classification.

Also enclosed is a copy of the EPA notification dated January 31, 1983 stating that we are in violation of the statutes as they apply to 40CRF Part 265 and the operation of a hazardous waste treatment, storage, and disposal facility.

It is our understanding that as a small quantity generator we are not required to submit such financial documentation as outlined. Your assistance in the clarification of this matter pertaining to our facility would be appreciated.



Again please be advised that our facility will continue to abide by all regulations applicable to small quantity generators.

Very truly yours,

GENERAL CABLE COMPANY

*Frank M. Portik*

Frank M. Portik  
Industrial Relations Manager

FMP/jt

Enclosures

cc: Ms. Cam, EPA Region II - Grants Administration Branch  
T. Ambrose - Greenwich 500  
W. Koblowski - N.B.  
F. Muhaw - Woodbridge

**GK Technologies**  
Incorporated

500 West Putnam Avenue, Greenwich, Connecticut 06830 (203) 661-0100  
Cable Address: GKTECH GREENWICHCONNECTICUT Telex Number 996439

11 JUN 1981

RE Q.  
delete  
TSD

"CERTIFIED"

May 26, 1981

AP/6/10

Room 215  
EPA 147

EPA Region II  
Solid Waste Office  
26 Federal Plaza  
New York, N. Y. 10007

RE: General Cable Company  
25 Van Dyke Avenue  
New Brunswick, N. J. 08903  
EPA I.D. No. NJD002143261

Dear Sirs:

On November 18, 1980, Part A of the RCRA hazardous waste permit application was submitted for the referenced facility.

Please be advised that after careful review of the Environmental Protection Agency's Admendments regarding small quantity generator standards that were promulgated in November 19, 1980, the New Brunswick plant is not a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act Regulations.

Please be assured that the plant will continue to abide by all regulations applicable to small quantity hazardous waste generation.

Very truly yours,

*Thomas P. Ambrose*

Thomas P. Ambrose  
Energy & Environmental Manager

TPA:mlh

cc: Solid Waste Administration  
Div. of Environmental Quality  
P. O. Box CN027  
Trenton, N. J. 08625

F. E. Peck, Plant Manager  
New Brunswick Plant



## ALPHADUCT PRODUCTS

P. O. Box 709, 25 Van Dyke Avenue, New Brunswick, New Jersey 08903 (201) 249-8090

"CERTIFIED"

November 16, 1982

Mr. Frank Coolick  
Bureau of Engineering Review  
32 East Hanover Street  
Trenton, New Jersey 08625

RE: Notice Of Violation  
Failure To Submit Annual Report  
GENERAL CABLE COMPANY  
25 Van Dyke Avenue  
New Brunswick, New Jersey 08903

Dear Mr. Coolick:

After a review of N.J.A.C. Subchapter 7 which was sent to me by Mr. Chang of your department and subsequent discussions with him we feel Subchapter 7 does not apply to our New Brunswick facility and therefore we are not in violation of N.J.A.C. 7:26-7.6 (f) 2.

The New Brunswick plant is not a hazardous waste treatment, storage or disposal facility under the Resource Conservation and Recovery Act. General Cable has notified the EPA Region II that we are not a T.S.D. and that the plant is considered a small quantity generator under the act. We have also assured the EPA that we will continue to abide by all applicable regulations. We have submitted the required Generator's Annual Report for 1981 during February of this year and a copy would be made available should you require it. Enclosed is a copy of our letter to the EPA Region II and the Solid Waste Administration of New Jersey regarding our classification under RCRA.

Should you have any further questions concerning our response to the notice of violation please do not hesitate to contact me.

GENERAL CABLE COMPANY

F. M. Portik  
Industrial Relations Manager

FMP/jt

encl.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

NJDW2143261

GENERAL CABLE COMPANY  
PORTIK FRANK IND REL MANA  
25 VAN DYKE AVENUE  
NEW BRUNSWICK

NJ 08903

CC: W. KOSIOWSKI

D. ROSINDIR

F. MUHAMMAD -

2/4/83

T. AMBROSIO

Re:

EPA Identification number:  
Facility located at:

Dear Sir or Madam:

The Environmental Protection Agency (EPA) is charged with responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-580 (1976).]

By notification you informed EPA that you conduct activities involving hazardous waste at the above-referenced facility. By the submittal of a Part A application pursuant to the requirements of 40 CFR Part 122, you requested a permit to conduct such hazardous waste activities.

40 CFR Part 265 sets interim-status standards for hazardous waste treatment, storage, and disposal facilities. These standards apply until final administrative disposition of permit application for these facilities has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply thereto.

40 CFR §265.143 (amended on April 7, 1982) requires that by the effective date of the regulation (July 6, 1982) an owner or operator of a hazardous waste facility must establish financial assurance for closure of the facility, as well as post-closure monitoring. As of December 15, 1982, information available to EPA indicates that your facility had not submitted the documents necessary to comply with this requirement. You are therefore in violation of 40 CFR §265.143.

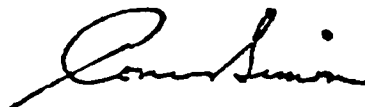
40 CFR §265.147 (amended on April 17, 1982) requires that by the effective date of the regulation (July 17, 1982) an owner or operator of a hazardous waste facility must establish financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility. As of December 15, 1982, information available to EPA indicates that your facility had not submitted the documents necessary to establish compliance with the liability insurance requirement. You are therefore in violation of 40 CFR §265.147.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or the regulations. The determination of whether a penalty is to be imposed is based upon the nature and the seriousness of the violation and any good faith efforts to comply with the applicable requirements.

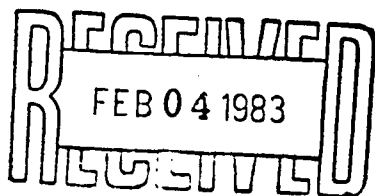
It is your responsibility to correct all violations as expeditiously as possible. Should the violation(s) cited above not be cured within twenty (20) days of the date of this letter, it is likely that an action for the assessment of a civil penalty will be initiated. If you rectify the above-cited non-compliance within the twenty (20) day period, EPA will exercise its enforcement discretion and not assess a penalty for past financial requirements noncompliance. Furthermore, this letter in no way precludes an enforcement action for any other violations found at your facility.

In order to ensure that you are in compliance with the regulations, you must submit a copy of the required documents to Helen Beggan, Chief, Grants Administration Branch, Office of Policy and Management, U.S. Environmental Protection Agency, 26 Federal Plaza, New York, New York, 10278, within twenty (20) days of the date of this letter. Should you need any help concerning the applicability of the financial requirements to your facility, please call Mr. Joseph Cvinar of that Branch at (212) 264-9862. Please note that if you have submitted the necessary documents, you should contact Mr. Cvinar immediately.

Dated: New York, New York  
January 31, 1983



CONRAD SIMON  
Director, Air and Waste Management  
Division  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, New York 10278



NEW YORK  
ENVIRONMENTAL  
FEB 22 3 43 PM '83  
GRANTS ADMINISTRATION

REFERENCE NO. 7



ROMC.

Central

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON  
DIRECTOR

25 APR 1983

LINO F. PEREIRA  
DEPUTY DIRECTOR

Frank Portik,  
Industrial Relations Manager  
General Cable Company  
25 Van Dyke Avenue  
New Brunswick, NJ 08903

RE: Hazardous Waste TSD Facility Status of:  
General Cable Company  
EPA ID No. NJD002143261

Dear Mr. Portik:

The Bureau of Hazardous Waste Engineering has reviewed your request that the above referenced facility be delisted from classification as a hazardous waste treatment, storage or disposal (TSD) facility by application of the small quantity generator (S.Q.G.) exclusion.

Please be advised that a generator is a "small quantity" generator in New Jersey if, in a calendar month he generates less than 100 Kilograms of hazardous waste in that month, unlike the federal regulations which allow 1000 kilograms to be generated per month. The amount of hazardous waste that may be accumulated on-site before the waste is subject to regulation as a hazardous waste also differs between the federal regulation 40 CFR Part 261.5(f) (1000 kg) and the state regulation 7:26-8.3(e) (100 kg). Generators claiming small quantity generator status in any calendar month must be able to supply records supporting eligibility [7:26-8.3(i)].

Therefore your company is hereby requested to substantiate its claim of small quantity generator as compared to N.J.A.C. 7:26-8.3 before the Bureau can give your request further consideration. A copy of subchapter 8 is attached for your reference.

Should you decide not to further pursue this issue your facility shall continue to be included in the Departments list of "existing" facilities (see N.J.A.C. 7:26-1.4 and 12.3) thereby subjecting it to the "TSD" annual report requirements [7:26-7.6(f) 2].

2 5 APR 1983

Page 2

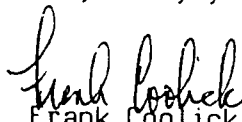
As you are probably aware, a generator accumulating waste in containers (NOTE: TSD facility permits are required for the storage of hazardous waste in tanks for less than 90 days in New Jersey) on-site for 90 days or less in compliance with N.J.A.C. 7:26-9.3 is eligible for exclusion from regulation as a TSD facility, and may be reclassified to "generator only" status.

Should you find your facility cannot meet New Jersey's more stringent Small Quantity Generator requirements, but can comply with the less-than-90-day generator accumulation standards, you may request reclassification from TSD facility status to "generator only" status.

In the interim, your company presently remains listed as a TSD facility in the Departments record, as a consequence of having filed a RCRA Part A application with the USEPA. Therefore, the requirement for your company to file an annual report for a TSD facility pursuant to N.J.A.C. 7:26-7.6(f) 2 remains outstanding. This office will hold this matter in abeyance for thirty (30) days from the date of this letter, pending receipt of your company's documentation on eligibility for exclusion as either a small quantity generator or as a "generator only" accumulating waste in containers for less than ninety (90) days.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief  
Bureau of Hazardous Waste Engineering

FC:WN:ch

Attachment

cc: Joel Golumbek  
USEPA-Region II



REFERENCE NO. 8



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON  
DIRECTOR

LINO F. PEREIRA  
DEPUTY DIRECTOR

0 1 JUL 1983

Mr. F. M. Portik  
Industrial Relations Manager  
General Cable Company  
PO Box 709  
25 Van Dyke Avenue  
New Brunswick, New Jersey 08903-0709

RE: General Cable Company  
EPA ID NO. NJD002143261

Dear Mr. Portik:

HA  
WCM  
7/12/83

The Bureau of Hazardous Waste Engineering is in receipt of your letter dated June 9, 1983 requesting that the referenced facility be reclassified from a hazardous waste treatment, storage or disposal (TSD) facility to "generator only" status. This letter also follows up on a June 16, 1983 telephone conversation between Ms. Tuggia and Mr. Walter Nedick of my staff, and your previous letter dated May 20, 1983.

As explained by you, it is the Bureau's understanding that the referenced facility has never stored hazardous waste in tanks and that the activity code (S02) indicating such on the company's RCRA Part A application was made in error, and the company only stores in containers.

Therefore, on the basis of this information, the Bureau classifies your facility solely as a generator provided the following conditions are complied with:

1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
3. The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

01 JUL 1983

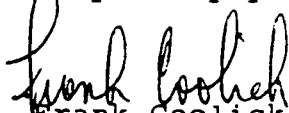
4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

This written acknowledgement of the delisting of the above identified facility from TSD facility status to generator status, is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occurring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (See N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities". It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,



Frank Coolick, Chief  
Bureau of Hazardous  
Waste Engineering

FC:WN:jb

c: Dave Shotwell  
DWM- Enforcement

Joel Golumbek ✓  
USEPA, Region II

Dave Leu  
NJDEP-DWM